

EXHIBIT 132

**DECLARATION UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746**

1. My name is Clare Schexnyder. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of DeKalb County in Georgia and my residence address is [REDACTED], Decatur, GA 30030.
3. I observed the opening of absentee ballots and the counting of early and absentee ballots at the DeKalb County Board of Elections on November 5, 2019, which was election day for municipal elections. I was observing the counting as a representative of a candidate in the election.
4. Earlier that day, during regular voting, I witnessed confusion over polling places. Renfroe Middle School had been a voting precinct in the past but was closed for this election. Voters who usually voted at Renfroe were sent to either Oakhurst Baptist Church or Evergreen Baptist Church. There was a sign at Renfroe Middle School stating that the polling location at Renfroe was closed and directing voters only to Oakhurst Baptist Church. Some voters did not receive advance notice of the precinct change. Voters who went to Renfroe left and went to Oakhurst Baptist, as the sign directed. Some of these voters arrived at Oakhurst Baptist to find out that they were supposed to vote at Evergreen Baptist instead. These voters were not offered provisional ballots. Instead, the poll workers at Oakhurst told the voters to

go to Evergreen Baptist Church. Everyone was able to vote eventually, but many people had to go to multiple precincts in order to be able to vote.

5. When I arrived at the DeKalb Board of Elections on November 5 for the counting of the early and absentee ballots, I spoke to Erica Hamilton and Sam Tillman to express my concerns about what happened at Renfroe and Oakhurst Baptist. Ms. Hamilton told me that a notice of the precinct change was sent to the affected voters.
6. The counting of early voting was scheduled to begin at 5:00pm on November 5. Observers like me were supposed to be sequestered from 5:00-7:00 while absentee ballots were reviewed with optical scanners. It seemed that the Board of Elections was not prepared for the number of people who observed the ballot counting. The counting was taking place in a small room and there were not enough chairs. There was no clear process for ensuring that the observers did not record or photograph the proceedings as the sequester required. I voluntarily handed in my phone, but no one asked me to do it. The room was not clearly identified as a space in which recording was not allowed. No one seemed to be enforcing the requirement that observers be sequestered. Other observers who were present said that in past years the process was much more secure and took place in an auditorium.

7. I left the room where the counting was taking place in order to get a chair for an older lady who did not have a seat. When I came back in, no one asked me for identification or why I was there. The whole process was very disorganized.
8. At 7:00 p.m. the Board of Elections staff gave back our phones and said that they would have the ballot count in ten minutes. They then said that anyone parked to the left of a silver Mazda needed to move their car.
9. About an hour later, the Board of Elections staff had not come back in with the ballot count. I asked Sam Tillman what was going on and why they didn't have the vote count yet. Mr. Tillman looked upset. He walked out of the room and then came back with about thirty pages and said, "this is my own personal copy of the absentee and early vote count." The pages he handed me had the vote count broken down by municipality. I distributed the results for each municipality to the observers for the elections in those municipalities. Then, poll workers from the individual precincts began to stream in with the yellow cards. The experienced observers said that the vote counting was not usually done this way, even for small elections.
10. I was surprised and concerned by the disorganization that I witnessed at the DeKalb Board of Elections early and absentee vote counting. The process was not well run and did not seem secure.

11. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

12. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.

13. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 17 day of January, 2019.


Clare Schexnyder